REMARKS

I. Specification

The recommendations for section headings on pages 2 and 3 of the Office Action were adopted generally and appropriate changes have been made in the specification.

II. Indefiniteness Rejection

Claims 1 to 9 and 13 to 19 were rejected under 35 U.S.C. 112, second paragraph for indefiniteness.

Claims 1 to 19 have been canceled, obviating their rejection for indefiniteness.

New claims 20 to 40 have been added. These new claims have been drafted according to U.S. Patent Office Rules and antecedent basis for claim terms has been checked and is maintained in these new claims.

New claims 26 and 27 correspond to canceled claims 6 and 7 and do define a preferred data structure for the relationship information for the reference object. The coded example of claim 6 has been redrafted to omit ..., i.e. the ellipsis. The changed form of the coding is not "new matter" because one skilled in the coding art would recognize that "i" is an integer that starts at 1 in the data structure of claim 6 and increases by 1 until it reaches N. The integer "j" also starts at 1 and increases by one until it reaches N. The features of claims 26 and

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27 are however only features of preferred embodiments.

The new claim 20 includes features from canceled claim 1 and from pages 9, 10 and 11, especially from page 10, lines 2 to 13, of applicants' detailed description. Basis for the subject matter regarding the transmitter, receiver and transmission system and their structure in the preamble of claim 20 and the features of step b) are found on page 9 and in figure 1. The features of step a) of claim 20 are basically the features of canceled claim 1. The features of steps c) to e) of claim 20 have basis in page 10, lines 2 to 13, of applicants' specification.

For the foregoing reasons it is respectfully submitted that new claims 20 to 40 should not be rejected under 35 U.S.C. 112, second paragraph.

III. Rejection based on 35 U.S.C. 101

Claims 1 to 19 were rejected under 35 U.S.C. 101 as directed to non-statutory subject matter.

Claims 1 to 19 have been canceled, obviating their rejection for this reason.

New claims 20 to 40 are limited to a method of encoding reference objects together with relational information in a transmitter, transmitting the reference objects and relational information in encoded form to a receiver and decoding them with a decoder in the receiver. The claimed method cannot be performed mentally as it is limited to being performed by a transmitter including an encoder with an associated database and to a receiver including a decoder with an associated database. Furthermore other steps are performed by the various

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parts of the apparatus recited in the preamble of claim 20.

For the foregoing reasons and because of the new features included in new claims 20 to 40 it is respectfully submitted that none of the new claims 20 to 40 should be rejected under 35 U.S.C. 101.

IV. Claim Objections

All the new dependent claims 21 to 40 depend either on independent claim 20 or a single dependent claim. There are no multiple claim dependencies in new claims 20 to 40 and thus the new claims do not suffer from the deficiency of canceled claim 10.

It is respectfully submitted that none of the new claims should be objected to under 37 C.F.R. 1.75.

V. Anticipation Rejection

Claims 1 to 19 were rejected under 35 U.S.C. 102 (e) as anticipated by Friedrich, et al, US 6,393,149.

New claims 20 to 40 have been filed above and claims 1 to 19 have been canceled. New independent claim 20 includes additional features and limitations to distinguish it patentably from the subject matter of Friedrich, et al.

Friedrich, et al, discloses a method of data compression for data representing road segments of a road network in a geographic data base in an automobile navigation system (claim 1 and column 4). Data compression is important in these systems because of the limited memory resources in auto

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navigation systems operating with a GPS receiver, since map data is usually stored on CD ROM so that data retrieval can be comparatively slow.

In the data compression method of Friedrich, et al, matching substrings of data in the geographic data base are identified and further occurrences of the substrings are replaced by a substring code (claim 2).

The method claimed by the new claim 20 is clearly entirely different from that of Friedrich, et al especially because of added steps b) to e) in new claim 20.

First Friedrich, et al, does not disclose steps b) and c) of the method claimed in claim 20, namely transmitting the encoded relationship information from a transmitter to a receiver (step b of claim 20) and decoding the relationship information in the receiver with the decoder (step d of claim 20). Furthermore the reference does not teach or suggest searching the database in the receiver to determine whether or not to store the reference object in the database of the receiver.

Each and every feature of a claimed method must be present in a prior art reference used to reject the claimed method under 35 U.S.C. 102. See MPEP 2131 and the court decisions cited therein.

Because of the many features of the new claim 20 that are not present in Friederich, et al, it should be apparent that this reference cannot be used to reject the inventive method of new claim 20.

Furthermore Friedrich, et al, teaches a navigation device including a <u>single</u> database 40 stored on e.g. a CD ROM device. This reference, especially column

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4, lines 31 to 60, does not teach or suggest **two different databases** and

transmission of reference objects together with relational information in

encoded form from one database to the other, as claimed in new claim 20.

In the method claimed in claim 20 two different databases, e.g. digital

maps with different resolution and/or different kinds of referenced attributes, such

as railway stations, parking lots, bust stops, and the like, can transfer, copy

and/or update their data, e.g. copy the new reference objects from a transmitter

to a receiver database without having to rely on the relationships defined by the

road network and the structure of the databases. In contrast to the data

compression method of Friedrich, et al, reference objects can have more

information, e.g. neighborhood relationships, than the data compression method

of Friedrich, et al. The method claimed in claim 20 transmits additional data to

better identify objects in different databases, whereas the method of the

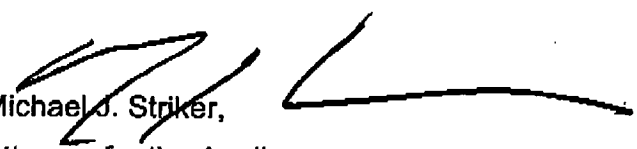reference only compresses data of a single data base to save memory.

For the foregoing reasons it is respectfully submitted that new claims 20 to

40 should not be rejected either as anticipated under 35 U.S.C. 102 (e) or as

obvious under 35 U.S.C. 103 (a) over Friedrich, et al, US 6,393,149.

Should the Examiner require or consider it advisable that the specification,

claims and/or drawing be further amended or corrected in formal respects to put

this case in condition for final allowance, then it is requested that such

amendments or corrections be carried out by Examiner's Amendment and the

case passed to issue. Alternatively, should the Examiner feel that a personal

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discussion might be helpful in advancing the case to allowance, he or she is invited to telephone the undersigned at 1-631-549 4700.

In view of the foregoing, favorable allowance is respectfully solicited.

Respectfully submitted,

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